

**REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. New claims 43-44 have been added. Claims 1-10 and 12-44 are pending. No claims have been amended. The claims are addressed below in the order in which they were addressed in the Office Action and the remarks are more directed to the Examiners Response to Arguments beginning at page 2 of the Action.

**Response to Arguments**

**Claim 1** defines a television tuner comprising "a country table listing a plurality of countries," and "multiple channel-to-frequency mapping tables correlating channel numbers to corresponding frequencies for associated countries in the country table, the channel-to-frequency mapping tables being indexed by the country table so that selection of a country in the country table references an associated channel-to-frequency mapping table for the selected country." **Claim 5** recites similar features.

Kohashi does not disclose these features. Kohashi describes a television channel selection apparatus that includes a table relating channel numbers to frequencies, a table relating broadcasting station codes to stations names, a table relating countries (or languages) and preferential orders of video formats, a table relating the formats and search times, and a table relating positions with channels and broadcasting station codes. (See Col. 8, lines 20-56). Nowhere, however, does Kohashi disclose "channel-to-frequency mapping tables being indexed by the country table so that selection of a country in the country table references an

1 associated channel-to-frequency mapping table for the selected country" as  
2 required by claims 1 and 5.

3 The Office argues that though Kohashi does not expressly show the  
4 elements of claims 1 and 5 that it is implied as the Kohashi system is based on a  
5 relational database. The Office further argues that combining the fields described  
6 in Kohashi implies that Kohashi describes the elements of claims 1 and 5. The  
7 Office cites specifically, Fig. 2a as a channel to frequency mapping table and cites  
8 the combination of tables Fig. 2a, 2b and 2e as disclosing a "channel-to-frequency  
9 mapping tables being indexed by the country table so that selection of a country in  
10 the country table references an associated channel-to-frequency mapping table for  
11 the selected country".

12 Applicant respectfully disagrees. Fig. 2a depicts the heading "channel /  
13 frequency" and shows a single table. Fig. 2b depicts the heading "broadcasting  
14 station code / broadcasting station name". Fig. 2e depicts the heading "pos[ition] /  
15 channel / broadcasting station code". Combining these tables may allow the  
16 broadcasting station name to be determined for a given channel or frequency, but  
17 it still does not show "channel-to-frequency mapping tables being indexed by the  
18 country table so that selection of a country in the country table references an  
19 associated channel-to-frequency mapping table for the selected country" as  
20 required by claims 1 and 5.

21 For these reasons, Kohashi does not disclose the invention of claims 1 and  
22 5. Therefore, Applicant respectfully requests that the §102 rejection of claims 1  
23 and 5 be withdrawn.  
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1       **Claims 2 and 6** depend from claims 1 and 5 respectively, and are allowable  
2 by virtue of this dependency. Claims 2 and 6 further require that “the country  
3 table lists the countries according to a uniquely assigned country code.” The  
4 Office argues that Kohashi discloses using the country name itself as a uniquely  
5 assigned country code. Applicant respectfully argues that such an interpretation is  
6 contrary to the common sense meaning of the claim language. For example, such  
7 an interpretation would lead to a table showing “country / code”, e.g. “France /  
8 France”. Kohashi contains no such language or Figure. Therefore, Applicant  
9 respectfully requests that the rejection of claims 2 and 6 be withdrawn.

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11       **Claim 3** depends from claim 1 and hence incorporates the features of claim  
12 1. As such, claim 3 requires “multiple channel-to-frequency mapping tables  
13 correlating channel numbers to corresponding frequencies for associated countries  
14 in the country table, the channel-to-frequency mapping tables being indexed by the  
15 country table so that selection of a country in the country table references an  
16 associated channel-to-frequency mapping table for the selected country.” Claim 3  
17 further specifies, “the country table lists the countries according to an ITU.”

18       Kohashi provides no disclosure, teaching, or suggestion of multiple  
19 channel-to-frequency mapping tables being indexed by a country table so that  
20 selection of a country in the country table references an associated channel-to-  
21 frequency mapping table for the selected country.

22       The Office takes Official Notice of the ITU standard as providing a table to  
23 identify each country. However, the ITU standard provides no teaching or  
24 suggestion of the “channel-to-frequency mapping tables being indexed by the  
25 country table so that selection of a country in the country table references an

1 associated channel-to-frequency mapping table for the selected country" as  
2 required by claims 1 and 3. Hence, the Official Notice provides no teaching of the  
3 missing element in Kohashi.

4 Accordingly, combining the references provides no suggestion of the  
5 claimed invention. Therefore, it is respectfully requested that the §103 rejection of  
6 claim 3 be withdrawn.

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8 **Claim 9** depends from claim 5 and hence incorporates the features of claim  
9 5. As such, claim 9 requires "multiple channel-to-frequency mapping tables  
10 correlating channel numbers to corresponding frequencies for associated countries  
11 in the country table, the channel-to-frequency mapping tables being indexed by the  
12 country table so that selection of a country in the country table references an  
13 associated channel-to-frequency mapping table for the selected country." Claim 9  
14 further specifies that the elements of claim 5 are "embodied in software as a  
15 dynamic linked library stored on a computer-readable storage medium."

16 The Office takes Official Notice that DLLs are well known but gives no  
17 evidence, teaching, or suggestion indicating it would have been obvious to utilize  
18 a DLL to provide the features of claim 9 and those incorporated from claim 5.

19 Additionally, the Office argues that it would be obvious to one of skill in  
20 the art to "modify Kohashi by developing software for "a specific television tuning  
21 component" as DLL so that the DLL file does not consume memory until used".  
22 Unfortunately, the Office provides no evidence as to how the skilled artisan would  
23 reinvent Kohashi's system into a structure that utilized DLLs. Further, the Office  
24 does not even indicate if the system of Kohashi is capable of accepting such  
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1 modification, nor where the suggestion lies in the reference to attempt such  
2 modification.

3 For these reasons, it is respectfully requested that the rejection of claim 9 be  
4 withdrawn.

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6 **Claim 12** includes "a tuner module coupled to adjust the tuner circuitry to  
7 scan multiple channels within a particular locale for corresponding tuning  
8 frequencies, the tuner module storing the tuning frequencies for the particular  
9 locale" so that "upon transporting the tuner to a new locale, the tuner module  
10 scans multiple channels within the new locale for corresponding tuning  
11 frequencies" and "upon transporting the tuner back to the particular locale, the  
12 tuner module retrieves the stored tuning frequencies to restore operation in the  
13 particular locale."

14 Kohashi is silent as to a tuner module that "retrieves the stored tuning  
15 frequencies to restore operation in the particular locale" upon "transporting the  
16 tuner back to the particular local." The Office argues that Kohashi has "an  
17 automatic presetting mode" that stores available frequencies and thus restoring  
18 those frequencies upon return to a particular locale is inherent. It is respectfully  
19 noted that claiming such a function must be inherent is a big step with no grounds  
20 for justification. Kohashi could just as inherently write over the information for a  
21 particular locale and then rescan for the information when the system is moved  
22 again. Therefore, Kohashi does not disclose the invention of claim 12. Applicant  
23 respectfully requests that the §102 rejection of claim 12 be withdrawn.

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1       **Claim 16** depends from claim 13 and hence incorporates all features of  
2 claim 13. In addition to the elements of claim 13, claim 16 further describes "a  
3 second tuner module different from the tuner module, the second tuner module  
4 being used to replace the tuner module during upgrade without replacing the  
5 tuning circuitry and the decoding circuitry."

6       The Office argues that DLLs are well known and that skilled artisans would  
7 construct the tuner modules as DLLs. Applicant contends that this argument is  
8 rooted only in hindsight reconstruction, which is impermissible. The  
9 reconstruction is evident from the fact that claim 16 does not even recite use of  
10 DLLs. Moreover, as noted above, the Office's assumption that the cited art  
11 systems can support DLLs is an untenable stretch. Perhaps most evident, the  
12 Office points to no teaching in the references for architecting a television tuning  
13 system with two tuner modules, one that replaces another during upgrade.  
14 Therefore, Applicant respectfully requests that the §103 rejection of claim 16 be  
15 withdrawn.

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17       **Claim 17** depends from claim 13, and therefore includes all of the  
18 limitations thereof. As such, Claim 17 requires, "the tuner module has a country  
19 table listing a plurality of countries and multiple channel-to-frequency mapping  
20 tables that provide video standards and correlate channel numbers to  
21 corresponding frequencies for associated countries in the country table, the  
22 channel-to-frequency mapping tables being indexed by the country table so that  
23 selection of a country in the country table references an associated channel-to-  
24 frequency mapping table for the selected country." Claim 17 further specifies "an  
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1 application program interface to expose functionality of the tuner module to an  
2 application program.”

3 The Office asserts that APIs are well known and therefore combining API  
4 technology with the elements of claim 13 from which claim 17 depends would be  
5 obvious. It is noted, however, that Applicant is not claiming APIs in general, but  
6 is claiming a specific API that exposes functionality of the tuner module to an  
7 application program. This is not obvious. The Office has provided no references  
8 that teach, hint, or suggest using an API with the system disclosed in claim 17.

9 The Office notes that Kohashi's system has a CPU. The Office then infers  
10 that since Kohashi has a CPU it can be reconfigured to use an API. Kohashi does  
11 not teach or suggest ways to alter or adapt the system to other configurations, and  
12 the Office does not provide any support for attempting such alteration. Further,  
13 beyond noting that Kohashi has a CPU the Office does not provide any reference  
14 suggesting that Kohashi could support an API application. Furthermore, it would  
15 seem that a great deal more of the architecture in addition to the CPU would need  
16 to be altered to support an API. This is well outside any reasonable realm of  
17 inherency and is not taught or suggested in the reference itself.

18 Therefore, the combination of Kohashi and Official Notice that APIs exist,  
19 fails to teach or suggest the features of claim 17. Therefore, it is respectfully  
20 requested that the §103 rejection of claim 17 be withdrawn.

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22 **Claim 27** defines an application program interface for a television tuning  
23 system. The API has methods for performing a number of specific functions.

24 The Office takes official notice that APIs are well known. Again,  
25 Applicant does not dispute that APIs, in general, are known. But, Applicant's

1 claim is directed to a specific set of APIs for a television tuning system. The  
2 simple statement that APIs are known does not substitute for *prima facie* evidence,  
3 gleaned from the cited references, teaching the claimed API for a television tuning  
4 system. Therefore, claim 27 is allowable and it is respectfully requested that the  
5 §103 rejection be withdrawn.

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7 Claim 28 defines a method that includes "receiving an ITU code for a  
8 particular country; and selecting, based on the ITU code, a set of TV channel-to-  
9 TV frequency mappings for use in the particular country." The Office provides no  
10 reference that discloses these features nor a combination of references that taken  
11 together teach or suggest combining their features to include those of claim 28.  
12 Therefore, taking Official Notice of the ITU along with the Kohashi reference still  
13 falls short of the elements of claim 28. For these reasons, claim 28 is allowable,  
14 and it is respectfully requested that the §103 rejection of claim 28 be withdrawn.

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16 Claim 36 depends from allowable claim 32 and is allowable as a result of  
17 this dependency. Moreover, this claim recites features that, taken together with  
18 those of claim 32, define features not disclosed in Kohashi.

19 In regard to claim 36, the Office cites "a tuner control signal corresponding  
20 to a frequency f1 is first sent from the microprocessor 3 waits that the frequency of  
21 PLL (not shown) in the tuner circuit 2 becomes stabilized to f1 and ATF signal is  
22 sent out from the tuner circuit 2" (Col. 14 lines 17-25). The Examiner states that  
23 this section of Kohashi discloses "scanning for a better quality frequency within  
24 the channel." Yet, the cited reference relates to ensuring that the signal sent from  
25 the tuner circuit in fact matches the intended value. It does not discuss "scanning



1 for a better quality frequency within the channel." For these reasons, claim 36 is  
2 allowable and it is respectfully requested that the rejections be withdrawn.

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4 **Claim 40** requires "configuring a tuning system for operation in a first  
5 locale by determining tuning frequencies for an associated set of channels",  
6 "storing the tuning frequencies for the first locale", "upon transporting the tuning  
7 system to a second locale, reconfiguring the tuning system for operation in the  
8 second locale" and "upon transporting the tuning system back to the first locale,  
9 retrieving the stored tuning frequencies to restore operation in the first locale."  
10 For the reasons given above with respect to claim 12, Kohashi does not disclose  
11 storing the tuning frequencies for the first locale so that upon transporting the  
12 tuning system back to the first locale these stored tuning frequencies can be  
13 retrieved to restore operation in the first locale. Therefore, the §102 rejection of  
14 claim 40 should be withdrawn.

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1 **Conclusion**

2 All pending claims 1-10 and 12-44 are in condition for allowance.  
3 Applicant respectfully requests reconsideration and prompt issuance of the subject  
4 application. If any issues remain that prevent issuance of this application, the  
5 Examiner is urged to contact the undersigned attorney before issuing a subsequent  
6 Action.

7 Respectfully Submitted,

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